

service requests that exceed defined interval parameters (because of *e.g.*, request complexity), due dates are negotiated directly with the customer.

The types of systems currently being used by GTE's units may differ, but each system is designed to receive, store and distribute service orders to the various organizations responsible for providing technical and administrative support to complete the orders. The service order distribution systems are due-date driven, based on the assigned service order due date derived from published standards or negotiated between the customer and the GTE service order center. Each customer is informed of the due date at the time the order is placed.

Orders for designed services flow to a Special Services Control Center ("SSCC") where the circuit layout is designed and the necessary equipment and circuit assignments are made. The work operations in this center are supported by a mechanized system called Circuit Network Administrative system ("CNAS"), which schedules service installation tasks based on service order due dates, performs inventory assignment functions, and for many circuit types performs mechanized circuit design functions. Services are made up of piece parts assigned from mechanized CNAS inventory databases. For each designed order the circuit is engineered and created from available facilities and equipment assigned by CNAS.

CNAS equipment and facility databases contain no special information on the identity of the customer. The circuit design is based entirely on the service ordered and its tariffed parameters. The mechanized assignment processes employed are blind to the use that the customer will make of the service. They assign equipment, facilities and telephone numbers on a "first-come, first-served" basis. The CNAS circuit design process is automated and is based on efficiency of routing and availability of facilities

appropriate for the service ordered by the customer. CNAS identifies and assigns specific pieces of equipment in each office rather than generic equipment types. CNAS contains no information on the quality of a particular facility or item of central office equipment; the processes of assignment and mechanized circuit design therefore present no opportunity for discrimination on that basis.

Once the ordered service has been designed, a document known as the Circuit Layout Record ("CLR") is automatically transmitted to the necessary work organization(s).

Service orders for both designed and nondesigned service are transmitted to a Facility Assignment Center ("FAC") or similar organization. These operations are supported by the Mechanized Assignment Record Keeping ("MARK") system, which inventories and assigns central office line equipment and telephone numbers. In instances where discrepancies in normal assignment functions occur, for example, where facilities or line equipment are unavailable, the order will be forwarded to a facility assigner who seeks alternate telephone company facilities. Because GTE's switched services are provided using common public network facilities selected automatically for each individual call, there is no opportunity for GTE to assign specific facilities or discriminate on the basis of quality. Any attempt to discriminate in the engineering of a circuit would require extraordinary manual effort -- among numerous individual employees in diverse locations -- and would result in costly disruption of the provisioning processes because of the bypassing of existing mechanized systems and procedures for circuit design and provisioning.

A control center coordinates the activities of the various organizations to assure that the physical work necessary to provide overall service is accomplished. Work

priorities are established by the due dates provided on the service order. The design of GTE's administrative support systems prevent individual employees from altering service orders, due dates or circuit related technical specifications.

When physical work is required at the customer's premises, a field technician is automatically dispatched using the Automated Work Administration System ("AWAS") to install the service to a network interface. After performing the necessary work, the technician tests the service for operational functionality and to ensure that tariffed technical specifications are met. Testing parameters are based only on the type of service ordered and are not associated with a customer's business affiliation. Because the sole purpose of the testing is to determine whether or not the installation meets tariffed standards, it is not necessary to record results more detailed than an indication of passage or failure.

When the service is established, the service order distribution system is updated to indicate completion. That system in turn notifies the billing system so that billing functions may be initiated.

A key performance measure used in determining compensation for GTE managers in installation work groups is the quality of service their units provide. The measurements track such items as the percent of installation due dates met for all types of services provided. Managers have a personal economic incentive to provide the best customer service in all cases.

All customers report service trouble to the Customer CARE center. The Customer CARE service attendant asks the identity of the service in trouble, the trouble location, and the nature of the trouble. If the Customer CARE service attendant cannot clear the trouble utilizing mechanized systems while speaking with the customer, GTE

will obtain the customer's name; however, restoration intervals depend strictly on the circuit type and the outage condition. In the case of nondesigned services, the customer is given a standard commitment interval depending upon the type of trouble reported and the facilities and equipment involved. These intervals are based on whether the customer is completely out-of-service, or whether the trouble only partially affects service. Customers with complete service outages are given priority treatment. The design of these mechanized systems, which are separate and distinct from the service order systems, prevents GTE employees from changing service intervals. In addition, there is no indication on the trouble record that distinguishes affiliated ESPs from nonaffiliated ESPs, or from any other customer.

Trouble reports for nondesigned services are entered into a mechanized trouble report tracking system, such as the Trouble Administration System ("TAS"). In conjunction with TAS, 4TEL Local Loop Test ("4TEL") or similar test systems, where installed, provide sophisticated testing capabilities for more accurate isolation of trouble. The tests performed and results obtained are used to restore the affected service to tariffed technical parameters. In the majority of cases, trouble reports for designed services are entered into a similar mechanized trouble tracking system.

Both manual and mechanized trouble records for designed and nondesigned services carry the date and time that a customer reported a service problem and the date and time that the problem was resolved. The trouble record serves as the audit trail for documentation of maintenance services quality and performance.

Trouble records involving designed services are passed on to the Special Service Control Center ("SSCC") that is assigned maintenance responsibility for the service. Upon receipt of the trouble record, the SSCC performs tests to determine the

cause of the reported trouble. Priority is given to trouble reports based on Commission-determined restoration requirements (*e.g.*, military installations) and known critical services such as hospitals and police and fire departments. Trouble records that do not fall into these categories are handled on a "first-in, first-out" basis.

After the cause of trouble is identified, the matter is referred to the work organization responsible for repairing the affected network element. These work groups restore service based on the same priorities described above. When the problem has been resolved, testing is conducted to ensure that service has been restored to tariffed technical parameters, and the customer is notified.

Once the service is restored, the trouble disposition and clearance time is noted on the trouble record. This information is currently used to generate maintenance reports which show average out-of-service duration for trouble reports. This index is and will continue to be carefully monitored by GTE as a key service indicator.

The performance of GTE managers in maintenance work groups is measured based on the quality of service their units provide. The measurements track such items as average out-of-service duration. Since the results of the measurement process is factored into compensation, managers have a personal economic incentive to provide the best customer service in all cases.

As demonstrated above, there is no opportunity for GTE employees to discriminate on the basis of quality in providing service to customers. The provisioning process is highly mechanized and automated, with little room for individual discretion or intervention. The systems used in the circuit design, facility and equipment assignment, installation coordination, and maintenance trouble tracking processes

contain no information as to a customer's business affiliation or the quality of particular facilities or equipment used to construct individual circuits.

GTE network installation and maintenance personnel will receive training on the Commission's requirements relating to the nondiscriminatory provision of services relating to ONA. GTE currently advises -- and will continue to advise -- employees involved in the provisioning of network services or the assignment of circuits that discrimination based upon the origin of a service request, or a customer's business affiliation, is forbidden. Violation of the rule will cause employees to be subjected to disciplinary action.

GTE will comply with the nondiscrimination reporting requirements applicable to the BOCs. GTE will file an annual affidavit stating that it does not discriminate in providing ONA services to competitive ESPs and their customers, including the installation, maintenance, and quality of such services. GTE will file quarterly installation and maintenance reports using the reporting categories and format adopted for BOC reports as described in *BOC ONA Reconsideration Order* at Appendix B.³⁰

VI. IMPLEMENTATION

A. Deployment

GTE will deploy its initial ONA services in all market areas where regulatory approvals, market and economic conditions, capacity limitations, and switching system feature package availabilities allow. This will provide the availability of GTE's ONA services for use by enhanced services providers in all of GTE's market areas. Appendix Q contains GTE's initial 3-year deployment report. Specific wire center

³⁰ *BOC ONA Reconsideration Order*, 5 FCC Rcd at 3096-3097.

capabilities will be published in GTE's ONA Services User Guide which will be available concurrently with the BOC publication of their User Guides in July 1995. The format of GTE's ONA Services User Guide will be uniform with those published by the BOCs, as defined by the IILC.

B. Tariffs

GTE's federal ONA services tariff filing will comply with the rules set forth by the Commission in the *Part 69 ONA Order*,³¹ which amended the Part 69 access charge rules to require the BOCs to modify their access tariffs to include the unbundled optional features and functions listed in their ONA Plans. The BSEs are regulated under price cap rules and priced to satisfy the price cap new services test.

Absent the grant of waiver requests³², GTE will file its intrastate ONA service tariffs by April 4, 1995.

VII. REPORTS

A. Annual

GTE will file the following annual reports, in compliance with the *GTE ONA Order*, with the first filing by July 31, 1996:

³¹ *Amendment of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture; Policy and Rules Concerning Rates for Dominant Carriers*, Report and Order & Order on Further Reconsideration & Supplemental Notice of Proposed Rulemaking, CC Docket Nos. 89-79 and 87-313, 6 FCC Rcd 4524 (1991) ("*Part 69 ONA Order*"), modified on recon., 7 FCC Rcd 5235 (1992), further modified on recon., 8 FCC Rcd 3114 (1993).

³² Filed concurrently herewith is GTE's waiver request asking permission to satisfy the FCC's requirement by state-level tariff filings within thirty days of the point at which the FCC's decision is known, *i.e.*, within thirty days of the effective date of the federal tariff changes, or within thirty days of a Commission decision (if there is one) explicitly permitting specified federal tariff changes to go into effect, whichever occurs earlier.

- Annual deployment projections for the current year and each of three future years for each ONA service, showing the percentage of access lines served in GTE's entire territory and by market area for all proposed interstate and intrastate ONA services.
- New ONA service requests from ESPs and ONA service requests that were previously deemed technically infeasible.
- Information on SS7, ISDN, and IN projected deployment.
- New ONA services available through SS7, ISDN, and IN.
- Progress reports on the implementation of service-specific and long-term uniformity issues.
- Billing information.
- OSS services.
- List of BSEs used in the provision of GTE's own enhanced services.

B. Semi-Annual

GTE will file the following semi-annual reports, in compliance with the *GTE ONA Order*, with the first filing by September 30, 1995:

- Matrix of GTE ONA services and State and Federal tariffs.
- ONA Services User Guide
- Updates on ESP requests, GTE responses, and services offered.

C. Quarterly

GTE will file the following quarterly reports, in compliance with the *GTE ONA Order*, with the first filing by January 30, 1996:

- Demonstration that procedures and systems for providing services preclude discrimination in installation and maintenance, and quality of ONA services.
- Compare timeliness of GTE's installation and maintenance of basic services for own enhanced services operations with that for all customers.

D. IILC Activities

GTE will report on GTE's implementation status of closed IILC issues concurrently with BOC report filing.

VIII. CONCLUSION

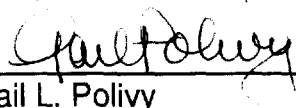
As set forth herein, the GTE Open Network Architecture Plan is in compliance with the *GTE ONA Order* and should be approved.

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies

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January 4, 1995

Their Attorneys

APPENDIX A

GTE/BOC ONA Services Comparison

(BOC Information from July 1994 ONA Services User Guides)

ONA Services Comparison

BOC July 1994 ONA Services User Guide - Generic Services	AM	BA	BS	NY	PB	SW	US	GTE
Type A - X.25 Packet Switched	BSA	BSA	BSA	BSA	BSA	BSA		BSA
Type B - X.75 Packet Switched	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Call Detail Recording Reports - Packet	BSE	BSE		B/C		BSE	BSE	CNS
Call Redirection - Packet	BSE	BSE	B/C	B/C	BSE	BSE	BSE	
Closed User Groups - Packet	B/C	B/C	B/C	B/C	BSE	BSE	BSE	
Direct Call - Packet	CNS	CNS	B/C	B/C	CNS	CNS	CNS	
Fast Select Acceptance - Packet	BSE	BSE	B/C	B/C	BSE	BSE	BSE	B/C
Fast Select Request - Packet	CNS	CNS	B/C	B/C	BSE	BSE	BSE	B/C
Hunt Groups - Packet	BSE	BSE	B/C	B/C	BSE	BSE	BSE	
Menu Access Translator - Gateway							BSE	
Message Waiting Indicator - Packet Access						BSE		
Preselection for Data Services		B/C	B/C	B/C	BSE	CNS		
Reverse Charge Acceptance - Packet	BSE	BSE	B/C	B/C	BSE	BSE	BSE	
Type A - Dedicated Metallic		BSA		BSA	BSA	BSA	BSA	
Type B - Dedicated Telegraph		BSA		BSA	BSA		BSA	
Type C - Dedicated Voice Grade	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type D - Dedicated Program Audio	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type E - Dedicated Video	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type F - Dedicated Digital (<64kbps)	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type G - Dedicated High Capacity Digital (1.544Mbps)	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type H - Dedicated High Capacity Digital (>1.544Mbps)	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type I - Dedicated Alert Transport		BSA	BSA	BSA	BSA			BSA
Type J - Dedicated Derived Channel		BSA	BSA	BSA	BSA	BSA		
Dedicated Network Access Link	BSA	BSA	BSA		BSA	BSA	BSA	BSA
Access To Clear Channel Transmission	BSE	BSE	BSA	BSE	BSE	BSE	BSE	BSE
Access To Operations Support Systems Information	BSE		B/C					
Automatic Protection Switching	BSE	BSE	B/C	BSE	BSE	BSE	BSE	BSE
Bridging	BSE	BSE	B/C	BSE	BSE	BSE	BSE	BSE
Conditioning	BSE	BSE	B/C	BSE	BSE	BSE	BSE	BSE
Data Over Voice (DOV) Service		BSA	CNS	BSA	CNS	CNS	BSA	BSE
Derived Channels (Monitoring)	BSE	CNS	CNS	CNS	CNS		CNS	CNS
Extended Superframe Conditioning	BSE	BSA	BSA			BSE	BSA	
Secondary Channel Capability	BSE	BSE	B/C	BSE	BSE	BSE	BSE	BSE
Statistical Multiplexer		BSE					BSE	
Verify Integrity of Subscriber Lines	B/C	CNS		BSA	BSE		CNS	
Type K - Dedicated Digital (64 kbps)	BSA	BSA	BSA	BSE	BSA		BSA	BSA
Network Reconfiguration	BSE	BSE	B/C	BSE	BSE	BSE	BSE	
Type A - Circuit Switched Line	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA
Type B - Circuit Switched Trunk	BSA	BSA	BSA	BSA	BSA	BSA	BSA	BSA

ONA Services Comparison

	AM	BA	BS	NY	PB	SW	US	GTE
Alternate Routing	BSA	BSE	B/C	BSE	BSA	BSE	BSE	BSE
Answer Supervision With a Line Side Interface	BSE	BSE	BSE		BSE		BSE	
Automatic Callback	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Automatic Recall	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Detail Recording Reports	BSE	BSE	BSE	B/C		BSE	BSE	
Call Forwarding - Busy Line Intrswitch	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Forwarding - Busy Line Interswitch	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Forwarding - Busy Line or Don't Answer - Customer Control of Activation/Deactivation	CNS		CNS	CNS	CNS		CNS	CNS
Call Forwarding - Busy Line or Don't Answer - Customer Control of Forward-To Number	CNS				CNS		CNS	CNS
Call Forwarding - Don't Answer Intrswitch	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Forwarding - Don't Answer Interswitch	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Forwarding - Multiple Simultaneous Calls Interswitch	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Call Forwarding - Variable	CNS	CNS	CNS	CNS	CNS		CNS	CNS
Call Forwarding - Variable - Activation Without Courtesy Call	CNS	CNS	CNS	CNS	CNS		CNS	CNS
Call Forwarding - Variable - Remote Activation/Control	CNS	CNS	CNS	CNS	CNS		CNS	CNS
Call Waiting - Cancel	CNS	CNS	CNS	CNS	CNS		CNS	CNS
Called Directory Number Delivery via DID		BSE	BSE	B/C	BSE		BSE	BSE
Flexible ANI Information Digits	BSE	BSE	BSE	BSE			BSE	
Called Directory Number Delivery via 900NXX	BSE			BSE				
Calling Billing Number Delivery - FG B Protocol		BSE	BSE		BSE		BSE	BSE
Calling Billing Number Delivery - FG D Protocol	BSE	BSE	BSE	BSE	BSE		BSE	BSE
Coin Phone With Post Dialing Tone Capability			BSE	CNS		CNS	BSA	
Calling Directory Number Delivery - via BCLID		BSE	BSE		BSE		BSE	
Calling Directory Number Delivery - via ICLID	CNS	BSE	CNS	CNS	BSE	CNS	BSE	B/C
Carrier Selection On Reverse Charge	BSA	BSE	BSA	BSE	BSA		BSA	BSE
Customer Originated Trace	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
DID Trunk Queuing		BSE			BSE		BSE	
Distinctive Ringing	CNS	CNS	CNS		CNS	CNS	CNS	CNS
Distinctive Ringing - Terminating Screening	CNS		CNS	CNS		CNS	CNS	CNS
Hot Line		CNS	CNS	B/C	CNS	CNS	CNS	CNS
Make Busy Key	BSE	BSE	B/C	B/C	BSE	BSE	BSE	
Message Desk (SMDI)	BSE	BSE	BSE	BSE	BSE	BSE	BSE	BSE
Message Waiting Indicator (MWI) - Ability To Receive Audible Message Waiting	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Message Waiting Indicator (MWI) - Ability To Receive Visual Message Waiting			CNS		CNS		CNS	
Message Waiting Indicator - Activation (Audible)	BSE	BSE	BSE	BSE	BSE	BSE	BSE	BSE
Message Waiting Indicator - Activation (Visual)			BSE		BSE		BSE	
Multiline Hunt Group	BSE	BSE	B/C	BSE	BSE	BSE	BSE	BSE
Multiline Hunt Group - C.O. Announcements	BSE		BSE	B/C	BSE	BSE	BSE	
Multiline Hunt Group - Individual Access To Each Port In Hunt Group	BSE	BSE	B/C	B/C	BSE	BSE	BSE	
Multiline Hunt Group - Overflow	BSE		B/C	BSE	BSE		BSE	

ONA Services Comparison

	AM	BA	BS	NY	PB	SW	US	GTE
Multiline Hunt Group - Uniform Call Distribution Line Hunting	BSE	BSE	B/C	B/C	BSE	BSE	BSE	BSE
Multiline Hunt Group - UCD With Queuing	BSE	BSE	BSE	B/C	BSE	BSE	BSE	BSE
Reverse Billing On Circuit Switched Access	BSE		BSE					
Selective Call Forwarding		CNS	CNS		CNS	CNS	CNS	CNS
Selective Call Rejection	CNS	CNS	CNS		CNS	CNS	CNS	CNS
Shared Speed Calling		CNS			CNS		CNS	
Speed Calling	CNS	CNS	CNS	CNS	CNS	CNS	CNS	CNS
Tandem Routing	BSE	BSE	BSE	BSA	BSA			
Three Way Call Transfer	BSE	BSE	B/C		BSE		BSE	BSE
Uniform 7 Digit Access Number - Remote Call Forwarding		BSE						BSE
Uniform 7 digit Access Number via Overlay Networking			BSE	BSE				
Warm Line	CNS	CNS	CNS	B/C	CNS	CNS	CNS	
Call Forwarding Don't Answer After Call Waiting (CFDA After CW)		CNS	CNS				CNS	
Faster Signaling On DID			BSE	B/C			BSA	
Cut Off On Disconnect			BSA	BSA				
Route Diversity	BSE	BSE	BSE	BSE		BSE		BSE
BOC July 1994 ONA Services User Guide - Region Specific Services								
Ameritech								
Multiplexing - Digital	BSE							
Multiplexing - Digital	BSE							
Multiplexing - Digital	BSE							
Message Desk (SMDI) - Expanded	BSE							
Message Waiting Indicator Activation (Audible) - Expanded	BSE							
Call Waiting	CNS							
Initial Address Message	BSE							
Coordinated Voice and Data Acceptance	BSE							
Call Redirection Acceptance	BSE							
Computer Assisted Call Transfer Acceptance	BSE							
Computer Assisted Dialing Acceptance	BSE							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Dedicated Network Access Link	BSA							
Multiplexing - Digital	BSE							
Bell Atlantic								
Multiple Network Addresses/Port - Packet		BSE						

ONA Services Comparison

	AM	BA	BS	NY	PB	SW	US	GTE
Call Waiting		CNS						
Inband Signaling		BSE						
Switched 56 Kilobit Service		BSA						
Three Way Calling		BSE						
Type A-Circuit Switched Line		BSA						
Type A-Circuit Switched Line		BSA						
Multiline Hunt Group		BSE						
Multiline Hunt Group		BSE						
Type B-Circuit Switched Trunk		BSA						
High Capacity Digital Hand-Off Service		BSE						
Line Monitor Service		BSE						
BellSouth								
Surrogate Client Number			BSE					
Trunk Side Access Facility			BSA					
Access To Order Entry System			B/C					
Called/Calling Number Information - ANI			BSE					
Custom Service Areas			BSE					
Multiplexing-Digital			B/C					
User Initiated Diagnostics			B/C					
Uniform Access Numbers for Business Lines			BSE					
Dialed Number Identification via INWATS to DID			B/C					
Third Number Billing Inhibited			B/C					
Priority Installation Service			B/C					
DS0-B Subrate Multiplexing Service			B/C					
Traffic Data Reports			BSE					
CFDA to DID Intraswitch			CNS					
Call Waiting			CNS					
Remote Call Forwarding			CNS					
Three Way Calling			CNS					
Switched 56 Kilobit Service			BSA					
Monthly Call Detail Recording			BSE					
NYNEX								
Bridging - Line				BSE				
Call Waiting				CNS				
Automatic Disaster Recovery of DID				B/C				
DID Load Across Wire Centers				B/C				
Traffic Data Reports				BSE				
Remote Call Forwarding				CNS				
Dialed Number Identification via INWATS to DID				BSE				
Three Way Calling				BSE				

ONA Services Comparison

	AM	BA	BS	NY	PB	SW	US	GTE
Default Window Size - Packet				B/C				
Incoming Calls Barred - Packet				B/C				
Multiple Network Addresses/Port				B/C				
Outgoing Calls Barred - Packet				B/C				
Permanent Virtual Circuit - Packet				B/C				
Reverse Charge Request Option (Packet)				B/C				
Multiplexing - Digital				BSE				
Pacific Bell								
Call Denial On Line or Hunt Group					BSE			
Service Code Denial On Line or Hunt Group					BSE			
Southwestern Bell								
Menu Server - Packet						B/C		
Multiplexing - Digital						BSE		
Third Number Billing Inhibited						CNS		
Route Diversity						BSE		
US West								
Incoming Calls Barred - Packet							BSE	
Outgoing Calls Barred - Packet							BSE	
Flow Control Parameter Negotiation - Packet							BSE	
Logical Channel Layout - Packet							BSE	
Logical Channels - Packet							BSE	
Multiple Network Addresses/Port							BSE	
Default Window Size - Packet							BSE	
Permanent Virtual Circuit - Packet							BSE	
Reverse Charge Request Option (Packet)							BSE	
ANI Forwarding							BSE	
Order Entry Service							BSE	
Transmission Improvement for Circuit Switched Services							BSE	
Traffic Data Reports							BSE	
Call Forwarding - Busy Line/Don't Answer Intraswitch							CNS	
Custom Ringing - Call Forwarding							CNS	
Dual Telephone Coverage							CNS	
CFDA to DID Intraswitch							CNS	
Call Forwarding - Busy Line/Don't Answer Interswitch							CNS	
Multiplexing - T1 Transport - 1.544 Mbps - Line Side							BSE	
Remote Call Forwarding							BSE	
Selective Call Acceptance							CNS	
Speed Calling							CNS	
Three Way Calling							BSE	
Dial Call Waiting							BSE	

ONA Services Comparison

	AM	BA	BS	NY	PB	SW	US	GTE
Distinctive Alert							BSE	
Directed Call Pickup Without Barge-In							BSE	
Directed Call Pickup With Barge-In							BSE	
Call Transfer on DID							BSE	
Abbreviated Call - Packet							CNS	
GTE Specific ONA Services								
Busy Number Redial								CNS
Saved Number Redial								CNS
Last Number Redial								CNS
Call Waiting (*)								CNS
Three Way Calling (*)								CNS
Remote Call Forwarding (*)								CNS
Call Forwarding - Fixed - All Calls								CNS
Call Forwarding - Busy Line/Don't Answer (*)								CNS
Special Call Waiting								CNS
Special Call Acceptance								CNS
Anonymous Call Rejection								CNS
Third Number Billing Inhibited (*)								B/C
Inband Signaling (*)								BSE
Call Restriction Service								CNS
Priority - Packet								BSE
MWI - Ability To Receive Audible Ring Burst								CNS
Megaconnect Service (SMDS)								BSE
GTE Dial Datalink								CNS
MWI - Activation (Audible Ring Burst)								BSE
Customer Controllable Ringing								CNS
High Capacity Digital Hand-Off Service (*)								BSE

(*) - Service also identified by at least one BOC as a Region Specific Service

Key: BSA = Basic Serving Arrangement

BSE = Basic Service Element

CNS = Complimentary Network Service

B/C = Basic Service Element & Complimentary Network Service

AM = Ameritech

PB = Pacific Bell

BA = Bell Atlantic

SW = Southwestern Bell

BS = BellSouth

US = US WEST

NY = NYNEX

APPENDIX B

BellSouth 120-Day Request Process Plan

(CC Docket 88-2, Filed May 19, 1989, pages 74-77)

~~examined non switch based capabilities as well. In the course of this re-examination, BellSouth identified a number of additional requested non switch based services that it expects to make available before July 1, 1992, but which are not on the initial list of ONA services. These capabilities include: Access to Extended Superframe (M032.0, NC#32); Dynamic Allocation of Transmission Capacity (M066.0, NC#65); Real Time Access to Exchange Network Testing Facilities (M068.0, NC#67); Clear Access to Derived Channels (M082.0, NC#81); Access to Clear Channel Transmission (M085.0, NC#84); Pass Through Diagnostics to Customer (M087.0, NC#86); and Access to Traffic Data (M111.0). BellSouth's analysis of these requested capabilities is reflected in Attachment C and summarized in Attachment L. BellSouth will update its deployment schedules to reflect these services when such information becomes available.~~

5. Each BOC Must State That, Within 120 Days After Receiving Any Complete, Written Request For A New ONA Capability, It Will Provide A Response That Indicates Whether Or Not And On What Terms It Will Make The Requested Capability Available. In Addition, Each BOC Must Describe In Detail The Criteria It Will Use In Determining When An ESP Inquiry Constitutes A Complete Request For A New ONA Service.⁶⁴

⁶⁴ BOC ONA Order at para. 397.

BellSouth will provide a response to each ESP request for a new ONA capability within 120 days after receiving any complete, written request. BellSouth's response will indicate whether BellSouth will provide the capability, and if so, when it will make the requested capability available, the approximate charge for the capability based upon the demand estimates provided by the requesting ESP, and any technical problems that are anticipated.

BellSouth has developed standardized procedures and forms to enable BellSouth to respond to ESP requests for ONA capabilities in accordance with the above commitment and the Commission's requirements. Internally generated requests from BellSouth's enhanced services personnel for ONA capabilities will be subjected to the same procedures and evaluation process as requests received from nonaffiliated ESPs.

ESPs will be able to initiate the review process by contacting their marketing representative or the Vendor Marketing Center (VMC) (BellSouth's COG organization) to inform BellSouth that they wish to formally request a new ONA capability. The marketing representative or the VMC may forward the ESP's name and phone number directly to an ESP Specialist.

Normally within about two days, the ESP Specialist will contact the ESP and discuss the request, advise which area of the ESP Request Form should be completed for the

particular request, and mail the Request Form to the ESP. After the ESP fills out the form, the ESP will mail it to the BellSouth ONA Market Development Organization. The ONA Market Development Organization will screen the requests for completeness and clarity, assign each request an ESP request number, catalog the request, and remove the ESP's name and other identifying information from all those materials to be subjected to the evaluation process.⁶⁵ If the written request form is not complete,⁶⁶ BellSouth's ONA Market Development Organization will contact the ESP to discuss what additional information is missing. The form will then be returned to the ESP for completion.

Upon receipt of a completed request for a new ONA service, the standardized form and related information will be forwarded by the ONA Market Development Organization to the ONA Product Development Organization. This group will coordinate BellSouth's evaluation of the requested capability and the collection of information necessary to provide the ESP with a written response in accordance with the above commitment and the Commission's requirements. Any proprietary information will be treated in accordance with

⁶⁵ By removing all references to the particular ESP submitting the request and tracking the request by ESP request number, BellSouth will further minimize the opportunity for discriminatory or preferential treatment in the evaluation process.

⁶⁶ The criteria that BellSouth will use in determining when an ESP inquiry constitutes a complete request for a new ONA capability is described below.

the terms of the standard nondisclosure agreement. See Section II.B.2, supra.

Simultaneously with forwarding the completed request to the Product Development Organization, the Market Development organization will mail a written confirmation of acceptance to the requesting ESP. The date on which a completed request has been received, as reflected in this written confirmation, will constitute day 1 of the request for purposes of calculating the 120 day response period. The ESP Specialist will serve as the ESP's point of contact for following the status of the request.

The specific criteria that BellSouth will apply in determining whether an ESP request for a new ONA service is complete are reflected in its standardized Request Form attached hereto as Attachment B. The information set forth therein is required to evaluate a request based on the four BSE selection criteria established by the Commission.

Some of the information requested in the standardized Request Form may not be relevant for a particular request and may not need to be provided. As explained above, BellSouth will assist ESPs in ascertaining what information may not be relevant to a particular request and any additional information which may be needed for evaluation. BellSouth is also developing a line-by-line instruction form to help the ESP understand what information will be needed for its request.

APPENDIX C

Southwestern Bell Interface Functionality CEI Plan

(CC Docket 88-2, Filed January 25, 1988, pages 116-119)

~~maintaining the cost of telecommunications services, including ONA-related services, at reasonably low levels.~~

~~Additionally, the Commission has not required mandatory collocation of ESP equipment within BOC central offices,⁸¹ and even with such collocation some form of short "access link" would nevertheless be required to connect the ESP's equipment to the BOC central office frame. Thus, SWBT's BSA Model represents a reasonable accommodation of Commission unbundling expectations under all of the circumstances.~~

~~SWBT's CNSs and Ancillary Services will be available on a completely unbundled basis.~~

B. Technical Equality

1. Interface Functionality

The Commission's Computer III requirements include the mandate that dominant carriers' basic services furnished to ESPs be "technically equal" to the basic services used to provide the carriers' own enhanced services.⁸² The Commission also has explained, however, that this mandate "does not demand impossible or grossly inefficient over-engineering of the network so that absolute equality is always

⁸¹Phase I Order, para. 164; Phase I Reconsideration Order, n. 247.

⁸²Phase I Order, para. 60; Phase I Reconsideration Order, para. 91.

achieved."⁸³ The Commission has established the following factors to be considered in evaluating whether its technical equality standard has been met in any given instance:

- (1) Absence of any systematic differences between basic service access given to the carrier and to others;
- (2) End-user perception of equality; and
- (3) Utility to other ESPs, i.e. whether any technical variations make a difference in the ability of competitors to provide their enhanced services.⁸⁴

Finally, the Commission also recognized that in exceptional cases, "a carrier may be able to provide a particular service only in a manner that prevents it from fulfilling all of the CEI parameters, which would include the technical equality standard."⁸⁵

SWBT's ONA Plan, analyzed in light of the above three factors, complies fully with the Commission's technical equality standard. There will be no systematic differences between basic services used by SWBT's enhanced services and those used by other ESPs, as demonstrated below in Subsections VI (C) (2) and (3). SWBT will provide technical characteristics at the interface that are equal, in all cases, from the end user perspective. That is, although there may be technically measurable differences in specific

⁸³Phase I Reconsideration Order, para. 92. (Emphasis added)

⁸⁴Id.

⁸⁵Id., n. 175.

interface performance characteristics, any such differences will always be minimal enough that there are no perceptible differences to the end users. No technical differences in SWBT's network interfaces will make a material difference in an ESP's ability to provide its services (as explained in the following subsection). It should be noted, however, that the Commission has expressly held that the BOCs need not sever or "split" the Packet Assembler/Disassembler (PAD)/network interface to meet the Commission's unbundled, equal access interface requirement in the packet services area.⁸⁶

In light of the MFJ Court's September 10, 1987 Order and Opinion,⁸⁷ SWBT and the other BOCs may only be able to provide Clause 1 and possibly certain Clause 3 (voice storage) enhanced services, since Clause 2 and most Clause 3 enhanced services are also information services that are still prohibited to the BOCs by the MFJ.⁸⁸ Thus,

⁸⁶Phase II Order, para. 53.

⁸⁷United States v. Western Electric Co., et al., Slip Opinion, Civil Action No. 82-0192, Order and accompanying Opinion (D.D.C. September 10, 1987).

⁸⁸Enhanced services currently are defined in Commission rules within three categories: those which employ computer processing applications that (1) "act on the format, content, code, protocol or similar aspects of the subscriber's transmitted information" (referred to herein as "protocol processing" or "Clause 1 functions"); (2) "provide the subscriber additional, different or restructured information" (referred to herein as "data processing" or "Clause 2 services"); and (3) "involve subscriber
(Footnote Continued)